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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JOHN DOE,) Case No. 4:25-cv-03140-JSW
Plaintiff,)
v.)
DONALD J. TRUMP, in his official capacity as) **STIPULATION TO EXTEND THE DUE DATE**
President of the United States of America, *et al.*,) **FOR DEFENDANTS' SUPPLEMENTAL**
Defendants.) **OPPOSITION TO PLAINTIFFS' MOTION FOR**
) **PRELIMINARY INJUNCTION; [PROPOSED]**
) **ORDER**
The Honorable Jeffrey S. White
S.Y., *et al.*,) Case No. 4:25-cv-3244-JSW
Plaintiff,)
v.)
KRISTI NOEM, in her official capacity as)
Secretary of the United States Department of)
Homeland Security, *et al.*,)
Defendants.)

ZHOUER CHEN, *et al.*) Case No. 4:25-cv-3292-JSW
Plaintiff,)
)
)

1 On May 7, 2025, the Court granted the parties' stipulation to an extension of time for
 2 Defendants' supplemental opposition to Plaintiffs' motion for preliminary injunction, setting the
 3 deadline for Defendants' opposition on May 8, 2025, at 5:00 p.m. *See* Dkt. No. 58. The Court noted that
 4 "[i]f the parties are not able to resolve these matters, the Court reserves the right to continue the hearing
 5 to May 14, 2025 at 10:00 a.m."

6 Following the Court's order, Plaintiffs and Defendants have been continuing to engage in
 7 negotiations to explore whether a potential resolution of these cases might be possible. Accordingly, the
 8 parties respectfully request the Court to grant an extension of time for Defendants' supplemental
 9 opposition to Plaintiffs' motions for preliminary injunction, and set the due date for Defendants'
 10 opposition to May 9, 2025, at 5:00 p.m. The parties additionally request that the Court set the due date
 11 for Plaintiffs' reply for May 13, 2025, at 12:00 p.m., and set a hearing in this matter for May 14, 2025, at
 12 10:00 a.m., which is the date and time the Court, in its May 7 order, stated it might set the hearing for,
 13 should there be any further extensions sought. Since the parties are now requesting those brief further
 14 filing extensions, they request that the Court does set the hearing in this matter for the May 14, 2025,
 15 date at 10:00 a.m. The parties do not anticipate any further extensions of time will be sought.

16
 17 Dated:

Respectfully submitted,¹

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 19 PATRICK D. ROBBINS
 20 Acting United States Attorney

21
 22 *s/ Elizabeth D. Kurlan* _____
 23 ELIZABETH D. KURLAN
 24 Assistant United States Attorney

25 Attorneys for Defendants

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 27 Dated:

28 *s/ John Nicholas Sinodis* _____
 29 JOHN NICHOLAS SINODIS
 30 Van Der Hout, LLP

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

1
2 s/ Andre Y. Bates
3
4

ANDRE Y. BATES
DeHeng Law Offices PC

5 **[PROPOSED] ORDER**
6

7 Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants will file their supplemental
8 opposition to Plaintiffs' motion for preliminary injunction by May 9, 2025, at 5:00 p.m. Plaintiffs will
9 file their reply by May 13, 2025, at 12:00 p.m. A hearing will be held on May 14, 2025, at 10:00 a.m.
10

11 May 9, 2025
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